IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

GRACE LAWRENCE

Plaintiff,

C.A. NO: 02-CV-4440

V.

TRANS UNION LLC CITY OF PHILADELPHIA

Defendant.

TRANS UNION LLC'S MOTION FOR SUMMARY JUDGMENT

Trans Union LLC ("Trans Union"), by and through its undersigned attorneys, moves this Court, pursuant to Federal Rule of Civil Procedure 56, for summary judgment. Trans Union is entitled to summary judgment because there is no issue of material fact and Trans Union is entitled to judgment as a matter of law. The reasons and authorities for this motion are set forth more fully in the attached Memorandum of Law in Support of Motion for Summary Judgment and Exhibits thereto; the Deposition of Grace Lawrence; the Deposition of Eileen Little; and the Deposition of William Stockdale.

Respectfully Submitted,

BRUCE S. LUCKMAN (38636) TIMOTHY P. CREECH (81728)

SATZBERG, TRICHON KOGAN & WERTHEIMER, P.C. 1818 Market St., 30th Floor Philadelphia, PA 19103 (215) 575-7600; Fax: (215) 575-7688 bluckman@mstkw.com; tcreech@mstkw.com

Attorneys for Defendant, Trans Union LLC

DATED: June 16, 2003